

Agenda Date: September 10, 2003
Item Number: A3

Docket: UT-030704

Company: Qwest Corporation

Staff: Erin Hannan, Telecommunications Analyst
Glenn Blackmon, Assistant Director – Telecommunications
Bob Williamson, Engineer

Recommendation

Grant the request by Qwest Corporation in Docket UT-030704 for a permanent exemption of WAC 480-120-439(4) and approve the request for an alternate reporting method under WAC 480-120-439(12), as modified.

Background

On May 14, 2003, Qwest Corporation (Qwest) filed with the Commission a petition for a permanent waiver of WAC 480-120-439(4) and an alternate method of reporting service quality performance measures under WAC 480-120-439(12). Qwest modified its request for an alternate method of reporting in a letter submitted August 22, 2003. WAC 480-120-439, regarding service quality performance reports, became effective July 1, 2003, replacing WAC 480-120-535.

WAC 480-120-439(4) establishes reporting intervals for installation or activation of basic service up to the initial five access lines. A monthly report must state, by central office, the number of orders not completed within 5 business days out of the total number of orders taken for the month. Quarterly and bi-annual reports must include the same information for orders not completed within 90 days and 180 days, respectively.

WAC 480-120-439(12) enables companies to propose an alternative reporting method for any of the service quality reports. The alternative method must still meet the performance standards associated with the required report, including the ability of the commission and other parties to enforce compliance. The performance standards for installation or activation of basic service are detailed in WAC 480-120-105.

Discussion

Qwest's petition for a permanent waiver of WAC 480-120-439(4) applies to reporting by orders taken. In its petition, Qwest cites accuracy and extraordinary expenses with modifying their centralized, 14-state reporting system from an orders completed format to an orders taken format. Under the previous service quality rules (WAC 480-120-535) and the Service Quality Performance Program created as part of the US West/Qwest merger, Qwest provides two monthly reports regarding installation appointments based on orders completed: a Missed Commitment Report for completed orders up to the first

five access lines for intervals of 5 and 90 days; and an Aging Report of orders held for any duration due to lack of facilities.

As an alternative reporting method, Qwest seeks permission to continue filing the monthly Missed Commitment Report and Aging Report for the five-day interval. The Missed Commitment Report provides the number and percentage of installation orders that were not completed in five days per central office while the Aging Report identifies the number of statewide orders that remain held for intervals of five days, thirty days, sixty days and year-to-date.

Qwest attempts to address the 90 and 180 day reporting intervals by modifying the OP-15A data – interval for pending orders delayed past due date – submitted as part of the 271 review process. The quarterly Pending Order Report will include for each central office: 1) total retail orders by central office completed for the quarter, up to the first five access lines, 2) total pending orders Qwest was unable to complete, 3) the average age of the pending orders, and 4) the number of retail inward line orders not completed more than 90 and 180 days beyond the original due date as of the date of the report. Additionally, Qwest requests an initial filing date of first quarter 2004 for this report in order to modify the OP-15A data.

Conclusion

Staff recommends the Commission grant Qwest's petition. The proposed alternative reporting method meets the performance standards and the associated enforcement for installation or activation of basic service as prescribed in WAC 480-120-105, and is as valid a measure of compliance as the method prescribed in 480-120-439(4).